

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA

Case No. 22-cv-1589 NEB-JFD

Woodstone Limited Partnership;  
Lofts at Farmers Market LLC,

Plaintiffs,

v.

City of Saint Paul, Minnesota, a Minnesota  
Charter City; City Council of the City of  
Saint Paul; Angie Wiese, in her official  
capacity as the Director of the Department  
of Safety and Inspections of the City of  
Saint Paul; Mayor Melvin Carter, in his  
official capacity as Mayor of the City of  
Saint Paul; and John Doe,

Defendants

**NOTICE OF MOTION TO  
INTERVENE BY KATHERINE  
BANBURY, ANGELA  
WILHIGHT, WESTSIDE  
COMMUNITY ORGANIZATION,  
ALLIANCE FOR METROPOLITAN  
STABILITY, HOME LINE**

**TO:** Plaintiffs Woodstone Limited Partnership and Lofts at Farmers Market LLC and their attorneys Joseph W. Anthony, Philip J. Kaplan, Kathryn E. Campblee, Anthony Ostlund Louwagie Dessen & Boylan P.A. 90 S. Seventh St., Minneapolis, MN 55402.

Defendants City of Saint Paul, Minnesota, City Council of the City of Saint Paul, Angie Wiese, in her official capacity as the Director of the Department of Safety and Inspections of the City of Saint Paul, Mayor Melvin Carter, in his official capacity as Mayor of the City of Saint Paul, and John Doe, and their attorneys, Megan D. Hafner and Kyle Citta, SAINT PAUL CITY ATTORNEY'S OFFICE, 750 City Hall and Court House, 15 West Kellogg Boulevard, Saint Paul, Minnesota 55102.

PLEASE TAKE NOTICE that on a date to be determine by the Court before the Honorable Nancy E. Brasel, United States District Court, 13W U.S. Courthouse, 300 South Fourth Street, Minneapolis, Minnesota 55415, Prospective Intervenor Katherine Banbury, Angela Wilhight, Westside Community Organization, Alliance for Metropolitan Stability and Home Line will move the Court, pursuant to Rule 24 of the Federal Rules of Civil Procedure for Intervention as of Right or, alternatively, for permissive intervention in the above captioned case.

Dated: October 20, 2022

**HOUSING JUSTICE CENTER**

/s John Cann

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